

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS DIVISION

BENNIE CUNNINGHAM, #A-62152	)	
	)	
Plaintiff,	)	No. 15-cv-000619-SMY-RJD
	)	
vs.	)	
	)	
BENJAMIN LEWIS, et. al.,	)	
	)	
Defendants.	)	

**PLAINTIFF'S PRETRIAL DISCLOSURES**

Now Comes Plaintiff Bennie Cunningham, ("Cunningham"), by his undersigned attorneys, and pursuant to Fed. R. Civ. P. 26(a)(3)(A), hereby make the following disclosures:

1. The name and if not previously provided, the address and telephone number of each witness – separately identifying those the party expects to present and those it may call if the need arises pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i):

a. Witnesses the Plaintiff expects to present:

1. **Plaintiff Bennie Cunningham**, c/o Mark Kurz, 5000 West Main Street, P.O. Box 23560, Belleville, IL 62223-0560 (618) 277-9000
2. **Defendant Benjamin Lewis**, c/o Melissa A. Jennings, 500 S. Second Street, Springfield, IL 62701 (217) 785-4555
3. **Defendant Jason Zollars**, c/o Melissa A. Jennings, 500 S. Second Street, Springfield, IL 62701 (217) 785-4555
4. **Trent Ralston**, (former Defenant), c/o Melissa A. Jennings, 500 S. Second Street, Springfield, IL 62701 (217) 785-4555
5. **Daniel Korte**, (former Defenant), c/o Melissa A. Jennings, 500 S. Second Street, Springfield, IL 62701 (217) 785-4555
6. **Dana Hall**, Nurse, Lawrence Correctional Center

b. Witnesses the Plaintiff may call if the need arises:

1. **Wayne Woodward**, Chief Engineer, Lawrence Correctional Center
2. Any witnesses listed or designated by the Defendants and/or Co-Defendant.
3. Any impeachment or rebuttal witnesses as necessary.

2. The designation of those witnesses by whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the depositions pursuant to Fed. R. Civ. P. 26(a)(3)(A)(ii): None.

3. An identification of each document or other exhibit, including summaries of other evidence – separately identifying those items the party expects to offer and those it may offer if the need arises pursuant to Fed. R. Civ. P. 26(a)(3)(A)(iii):

a. Exhibits the Plaintiff expects to offer:

1. July 10, 2014, Incident Report by Darnold, RN;
2. July 10, 2014, Incident Report by B. Lewis;
3. July 10, 2014, Incident Report by Zollars;
4. July 10, 2014, Incident Report by Ralston;
5. Plaintiff's July 24, 2014, grievances, relevant responses, and attachments;

b. Exhibits the Plaintiff may offer if the need arises:

1. Plaintiff's Complaint;
2. Plaintiff's Deposition;
3. Plaintiff's responses to discovery requests.

Respectfully submitted,

BOYLE BRASHER LLC

BY: /s/ Mark R. Kurz  
Mark R. Kurz, #06211071  
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	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2017, I electronically filed Plaintiff's Pretrial Disclosures with the Clerk of Court using the CM/ECF system, which will send notifications of such filings to all counsel of record.

Respectfully submitted,

BOYLE BRASHER LLC

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